UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JUAN IGARTUA, on behalf of himself and all others similarly situated,

Plaintiff,

v.

BRECKEN GOLD ATHLETICS NYC LLC,

Defendant.

Case No.: 1:24-cv-07955-AT

MOTION FOR DEFAULT JUDGMENT AND PERMANENT INJUNCTION

PLEASE TAKE NOTICE that Plaintiff Juan Igartua, pursuant to Federal Rules of Civil Procedure 55(b) moves this Court for a default judgment and permanent injunction against Defendant, Brecken Gold Athletics LLC. The grounds for this motion are set forth in the accompanying Affirmation in Support and Memorandum of Law.

Respectfully,

Joseph & Norinsberg, LLC

Arjeta Albani, Esq.

Joseph & Norinsberg, LLC

Attorney for Plaintiff

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Dated: March 21, 2025

New York, New York